

FURTHER INFORMATION ON DATA COLLECTION

Who is responsible for processing your data?

Santander Factoring and Confirming, S.A. E.F.C (hereinafter "the Entity" or "SFC").
Address: Gran Vía de Hortaleza, 3, 28033 Madrid.
Email: atencle@gruposantander.com

Contact privacy office/data protection officer: privacidad@gruposantander.es

Why and for what purpose do we process your personal data?

The different purposes of SFC processing are set out below:

- ✓ **Processing performed for the agreement.** They are required for the signing of the agreement or provision of the service being requested.

We will process your data to inform you about the arrangement of products and services for arranging them and also for maintaining and complying with the agreement.

For these purposes, SFC may, on its own or in collaboration with Banco Santander España, S.A., process your data to verify and assess your solvency and credit risk both for assessing the default risk for your transactions and also for new financing that you may apply to us for, considering even personal and economic information available from companies that provide information on solvency, non-performing loans and, in general, any indicators of financial or credit risk that SFC has access to.

In *factoring* transactions, SFC will communicate its information to the debtor in order to notify it of the assignment of the credit made as a result of the *factoring* transaction. This transfer of data could involve an international transfer of data, since the debtor entity could be located outside the European Economic Area.

In *confirming* transactions, SFC will communicate its information to the suppliers in order to notify them of the payment order for them. This transfer of data could involve an international transfer of data, since the suppliers could be located outside the European Economic Area.

To fulfil the contract, we will be able to resort to external sources of information, such as newspapers and official state bulletins, public records, rulings by public bodies, telephone books, lists of people who belong to professional associations and official lists for the prevention of fraud, social networks and the internet.

- ✓ **Processing carried out with your consent.** As long as you have provided consent in the box for this purpose on the form that we will give you.

1. - We will give your information to Banco Santander, S.A., so they may carry out sales actions, both in general and tailored to your sales profile, regarding products and services. These sales actions may be via any means, both physical and electronic (email/fax/SMS/social media/mobile applications).

If you do not authorise the processing of your data for the above purposes, it will not affect maintenance of or compliance with your contractual relationship with SFC.

✓ **Processing due to legitimate interest**

1.- We will process your data for performing sales actions, both general and adapted to your marketing profile, so that we can offer you products or services similar to those you have already arranged. The sales actions may be via any means, including electronic means (email/fax/SMS/social media/mobile applications).

2.- We will process your data to make observations and recommend you SFC's products and services. Specifically, we will process the information regarding products and/or services that you hold and also data regarding your savings and debt capacity. We will check the information we have from managing services that we provide to you or for products that you have arranged or maintained over the past year.

Through the two (2) instances of processing above, SFC is pursuing its legitimate interest in offering you the products and services that best adapt to your personal characteristics, and also the best conditions for products or services that you have arranged or may arrange in the future.

3.- We will process and/or transmit your data to third parties whether they are Santander Group companies or not to prevent, investigate and/or discover fraud. SFC's legitimate interest is to be aware of and identify participants in fraudulent activities and take the necessary action.

4.- We will record your voice and/or your image and save the telephone/video conversation, when we expressly indicate so. SFC's legitimate interests are to maintain service quality and manage claims received, and it may also use recordings as proof at court hearings and outside the courtroom where necessary.

5.- If you default on any payment, we may notify solvency companies such as Experian and/or Asnef, in compliance with the procedures and guarantees set out in current legislation at any time. SFC's legitimate interest is to comply with appropriate control and prevention of default situations, helping to safeguard the financial system and the economy in general insofar as it allows third-party entities access to solvency information when they have to analyse the solvency of applicants for risk transactions.

You may request an objection to any prior processing based on legitimate interest. To do so, please write to the Claims and Customer Service or the Privacy Office/Data Protection Officer, explaining the reason for your objection.

✓ **Processing to comply with a legal obligation**

We will process your data to comply with legal and tax obligations as applicable, such as preventing money laundering and financing of terrorism.

This obligation will remain in force even after the contractual relationship has finished if necessary.

What types of persons involved are covered by this document?

This document applies by stakeholder category: holder of an agreement, guarantors/guarantees and/or representatives

The legal bases for processing by type of person involved are as follows:

		PARTICIPANTS			
BASIS FOR LEGITIMATION		Holder	Guarantor/ Guarantee	Representative	Debtor
	Contract	YES	YES	YES	YES
	Consent	As authorised	As authorised	As authorised	As authorised
	Legitimate interest	YES	YES Fewer sales actions	YES	YES Fewer sales actions
	Legal	YES	YES	Fewer sales actions	YES Less risk assessment

How do we obtain your data?

SFC obtains your data through the following sources:

1. The information You provide us when you contract and hold products and/or services with us, both directly and indirectly. Some examples are: through queries, transactions or agreement applications.
2. External sources of information, such as newspapers and official state bulletins, public records, rulings by public bodies, telephone books, lists of people who belong to professional associations and official lists for the prevention of fraud, and also third-party companies to whom you have given your consent for the transmission of your data to banks, financial institutions and insurance companies.

Specifically, data we will process includes the following categories: data for identification purposes, data referring to your personal traits and social circumstances, academic and professional data and marketing information.

3. Companies that provide information on solvency, NPL, and in general, financial or credit risk indicators.

Specifically, data we will process includes the following categories: data for identification purposes, economic, financial and solvency data and data referring to goods and services transactions.

4. Where you are also customers of Banco Santander, S.A., said company will provide SFC with data that merely identifies you, so as to facilitate and speed up the contracting process.

In particular, the data we process includes the following categories: Data for identification purposes.

How long do we keep your data?

We use your personal data while it is necessary for the purposes for which it was collected. If you cancel all your contracts, we will cancel your data by blocking it.

When we block it, SFC will not have access to your data and will only process it to make it available to the competent public bodies, judges and courts or Tax Office in relation to possible liabilities relating to data processing, in particular for the exercise and defence of legal claims from the Spanish Data Protection Agency. We will keep your blocked data for the time frames set out in applicable provisions or, where applicable, in the contractual relationships with SFC, and physically erase your data once these time frames have passed.

Who will receive your data?

We transmit your personal data to:

1. Public bodies, the Tax Office, judges and courts and, in general, competent authorities when SFC is legally obliged to provide it.
2. If you default on any payment, we may notify solvency companies such as Experian and/or Asnef, in compliance with the procedures and guarantees set out in current legislation at any time.
3. Besides the above data transmission, SFC works in partnership with some third-party service providers who have access to your personal data and who process this data on behalf of the Bank as part of their services.

SFC follows strict service supplier selection criteria in order to comply with its data protection obligations and it undertakes to sign any corresponding data protection contract with them, which will impose, among others, the following obligations: apply appropriate technical and organisational measures, process personal data for the agreed upon purposes, following only the documented SFC instructions, and erase or return the data to SFC once the service provision is over.

Specifically, SFC will contract the provision of services by third-party providers that perform their activity in, including, but not limited to the following sectors: logistics services, legal advice, private appraisal services, provider approval, multidisciplinary professional services companies, companies related to maintenance, technological service provider companies, software service provider companies, instant messaging service providers, infrastructure maintenance and management companies and call centre service companies.

What are your rights when you provide us with your data?

You may exercise your rights of access, portability, rectification, erasure, restriction, objection and to not being subject to a decision based solely on automated processing. You may also revoke the consent you have given at any time.

To exercise these rights, send an email to privacidad@gruposantander.es or atencie@gruposantander.com or write a letter to Gran Vía de Hortaleza, 3, 28033 Madrid (A/A. Data Protection Officer/Privacy Office or Claims and Customer Service), always providing a copy of your ID or official document that identifies you.

To whom can you send your claims?

You can always write to the claims and customer service department or the privacy office/data protection officer.

You can also file a claim to the Spanish Data Protection Agency, if you disagree with the response you received. The necessary information is available on its website: www.agpd.es